

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:19-CR-995-HEA-NCC
)	
STEPHON JEFFERSON, JR.,)	
)	
Defendant.)	

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Anthony Franks, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Felon in Possession of a Firearm in violation of Title 18 United States Code Section 922(g).
2. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) the weight of the evidence against defendant is substantial in that defendant confessed to law enforcement that he was in possession of a firearm;
 - (b) defendant's history and characteristics include multiple felony convictions for firearm and drug offenses from 2010 to 2017. The alleged conduct giving rise to the instant offense also occurred while defendant was on supervised release in

case number 4:13CR00256JAR. In that case, defendant was convicted for distribution of heroin. Defendant's criminal history from 2010 to 2017 includes the following:

- i. 2010 felony convictions for unlawful use of a weapon (U UW), carrying a concealed weapon, and resisting arrest;
- ii. a 2012 U UW felony conviction;
- iii. a 2014 felony conviction in this court (case no. 4:13CR00256JAR) for distribution of heroin;
- iv. a 2014 felony conviction for possession of controlled substance except 35 grams or less of marijuana; and
- v. a 2017 felony conviction for U UW.

(c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial in that defendant has a history of abusing illegal substances while on supervision and his convictions include charges on various drug offenses and the use of weapons.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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United States Attorney

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